

resolute
Forest Products

5300 Cureton Ferry Road Post Office Box 7 Catawba, SC 29704-0007

FED EX NO. 7705 4126 1669

October 24, 2017

Ms. Connie Turner, Manager Air Toxics Section SCDHEC Bureau of Air Quality 2600 Bull Street Columbia SC 29201-1708

Re: MACT II Excess Emissions and Monitoring System Performance Reports

Air Permit No. TV-2440-0005

Dear Ms. Turner:

The purpose of this submittal is to meet the quarterly excess emission reporting requirements applicable to the Resolute Forest Products – Catawba Mill associated with the National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry (40 CFR 63, Subpart MM). The sources covered under Subpart MM are the No. 2 Recovery Boiler, No. 3 Recovery Boiler, No. 2 and No. 3 Smelt Dissolving Tank Vent, and the No. 2 Lime Kiln. This submittal meets the requirements of the Excess Emissions and Continuous Monitoring System (CMS) Performance Report pursuant to Sections 63.867(c) and 63.10(c), respectively.

Excess emissions and CMS downtime for the reporting period were less than 1% and 5% respectively for all systems. Therefore, only the summary reports are attached as allowed in §63.10(e)(3)(vii). For SSM purposes when an emission has occurred, specific information about the type and duration is reported on the enclosed log(s). All SSM events were consistent with the SSM Plan.

Based on information and belief formed after reasonable inquiry, I certify to the best of my knowledge, that the statements and information in this submission are true, accurate, and complete.

If you have any questions or require additional information, please contact Mike Swanson, environmental engineer at (803) 981-8010 or <a href="mike.swanson@resolutefp.com">mike.swanson@resolutefp.com</a>.

Sincerely,

Wayne Griffin General Manager

Enclosures: MACT II Logs

cc: SCDHEC – BAQ, Technical Management Section

Alex Latta, Midlands EA Lancaster

EPA Region 4

Environmental File 232.14

## GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

Pollutant:	Opacity
Time Period:	Minutes
Reporting Period:	July 1, 2017 through September 30, 2017
Process Unit Description:	No. 2 Recovery Boiler
Company:	Resolute Forest Products – Catawba Mill
Emission Limits:	35%
Monitor Manufacturer(s) and Model Number(s):	Teledyne Monitor Labs / Light Hawk 560 Opacity
	Monitor
Last CMS Certification or Audit Date:	Certification: October 20, 2006
	Audit: June 27, 2017
Total Source Operating Time in Reporting Period:	123,576 minutes

#### **EMISSION DATA SUMMARY**

Reason for Excess Emissions	Duration (minutes)	
	Over 35%	Over 20% for 60 minutes
A. Startup/Shutdown	0	0
B. Malfunctions		
Process/Instrument System	0	0
Control Equipment	0	0
Fuel Problems	0	0
Other Known Cause	138	818
Other Unknown Cause	0	0
Total Number of Incidents	8	5
Excess Emissions/Process Operating Time	0.11 %	NA

# CMS PERFORMANCE SUMMARY

Reason for Monitor Downtime	Duration (minutes)
Monitor Equipment Malfunctions	247
Non-Monitor Equipment Malfunctions	0
Quality Assurance	0
Other Known Cause	0
Other Unknown Cause	0
Total Number of Incidents	4
Percent Monitor Downtime	0.20 %

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Name/Title:	Wayne Griffin	General Manager
Signature:		
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## GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

Pollutant:	Opacity
Time Period:	Minutes
Reporting Period:	July 1, 2017 through September 30, 2017
Process Unit Description:	No. 3 Recovery Boiler
Company:	Resolute Forest Products – Catawba Mill
Emission Limits:	35%
Monitor Manufacturer(s) and Model Number(s):	Teledyne Monitor Labs / Light Hawk 560 Opacity
	Monitor
Last CMS Certification or Audit Date:	Certification: July 31, 2010
	Audit: June 27, 2017
Total Source Operating Time in Reporting Period:	132,480 Minutes

#### **EMISSION DATA SUMMARY**

Reason for Excess Emissions	Duration (minutes)	
	Over 35%	Over 20% for 60 minutes
A. Startup/Shutdown	0	0
B. Malfunctions		
Process/Instrument System	0	0
Control Equipment	0	0
Fuel Problems	0	0
Other Known Cause	0	162
Other Unknown Cause	0	0
Total Number of Incidents	0	2
Excess Emissions/Process Operating Time	0.00 %	NA

## CMS PERFORMANCE SUMMARY

Reason for Monitor Downtime	Duration (minutes)
Monitor Equipment Malfunctions	0
Non-Monitor Equipment Malfunctions	0
Quality Assurance	195
Other Known Cause	0
Other Unknown Cause	0
Total Number of Incidents	1
Percent Monitor Downtime	0.15 %

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Name/Title:	Wayne Griffin	General Manager
Signature:		
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## GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

Pollutant:	Opacity
Time Period:	Minutes
Reporting Period:	July 1, 2017 through September 30, 2017
Process Unit Description:	No. 2 Lime Kiln
Company:	Resolute Forest Products – Catawba Mill
Emission Limits:	20%
Monitor Manufacturer(s) and Model Number(s):	Monitor Labs USI 550 Opacity Monitor
Last CMS Certification or Audit Date:	Certification: October 27, 2012
	Audit: June 28, 2017
Total Source Operating Time in Reporting Period:	128,810 Minutes

## **EMISSION DATA SUMMARY**

Reason for Excess Emissions	Duration (minutes)	
	Over 20%	Over 20% for 60 minutes
A. Startup/Shutdown	0	0
B. Malfunctions		
Process/Instrument System	0	0
Control Equipment	0	0
Fuel Problems	0	0
Other Known Cause	147	126
Other Unknown Cause	12	0
Total Number of Incidents	10	1
Excess Emissions/Process Operating Time	0.12 %	NA

## **CMS PERFORMANCE SUMMARY**

Reason for Monitor Downtime	Duration (minutes)
Monitor Equipment Malfunctions	1599
Non-Monitor Equipment Malfunctions	0
Quality Assurance	300
Other Known Cause	0
Other Unknown Cause	0
Total Number of Incidents	7
Percent Monitor Downtime	1.47 %

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Name/Title:	Wayne Griffin	General Manager
Signature:		

## GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

Pollutant:	Particulate Matter
Time Period:	Hours
Reporting Period:	July 1, 2017 through September 30, 2017
Process Unit Description:	No. 2 and No. 3 Smelt Dissolving Tank Vent
Company:	Resolute Forest Products – Catawba Mill
Emission Limits:	0.2 lbs/ton BLS
Operating Parameters:	Differential Pressure > 1.5 inches of water column
	Liquid Flow Rate > 65 gpm
Monitor Manufacturer(s) and Model	DP – Rosemount 3051CD2A02A1AM5E55
Number(s):	Liquid Flow Rate – Foxboro IMT25PDADB10N-AB
Last CMS Certification or Audit Date:	Certification: August 3, 2004 (both)
	Audits: 6/22/17 (DP), 6/20/17 (Flow)
Total Source Operating Time in Reporting	2,192 hours
Period:	

#### **EMISSION DATA SUMMARY**

Reason for Excess Emissions	Duration (hrs)	
A. Startup/Shutdown	0	
B. Malfunctions		
Process System	0	
Control Equipment	0	
Other Known Cause	0	
Other Unknown Cause	0	
Total Number of Incidents	0	
Excess Emissions / Process Operating Time	0.00 %	

# CMS PERFORMANCE SUMMARY

Reason for Monitor Downtime	Duration (hrs)	
Monitor Equipment Malfunctions	0	
Non-Monitor Equipment Malfunctions	0	
Quality Assurance	0	
Other Known Cause	0	
Other Unknown Cause	0	
Total Number of Incidents	0	
Percent Monitor Downtime	0.00 %	

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Name/Title:	Wayne Griffin	General Manager
Signature:		